

EXHIBIT 24

DECLARATION OF
CHRISTOPHER A. MITCHELL

CELLULOSE MATERIAL SOLUTIONS vs SC MARKETING
TURNER, PAUL 09/14/2023

30(b)(6), Job 25860

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CELLULOSE MATERIAL SOLUTIONS,)
LLC,)
Plaintiff,)
vs.) Case No.
SC MARKETING GROUP, INC.,) 3:22-CV-03141-LB
Defendant.)

Videotaped deposition of PAUL TURNER, Volume I,
taken on behalf of Plaintiff, at 633 West Fifth
Street, Suite 1550, Los Angeles, California
90071-2048, beginning at 9:38 a.m. and ending at
11:14 a.m. on Thursday, September 14, 2023, before
Amanda J. Kallas, Certified Shorthand Reporter
Number 13901.

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1 APPEARANCES:

2
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23
24
25

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PAUL TURNER

(By Mr. Rogge)

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1 Thursday, September 14, 2023; Los Angeles,

2 California

3 9:38 a.m.

4 ---oOo---

5 THE VIDEOGRAPHER: Good morning.

6 My name is Craig Schumacher. I am the
7 videographer for today. I represent Fortz Legal in
8 Grand Rapids, Michigan.

9 I am not financially interested in the
10 action, nor am I a relative or employee of any of
11 the attorneys or any of the parties.

12 Today's date is September 14th, 2023. The
13 time is approximately 9:38 a.m. This deposition is
14 being taken at 633 West Fifth Street in Los Angeles,
15 California. The case number is 3:22-cv-03141-LB.
16 This case is entitled "Cellulose Material Solutions
17 versus SC Marketing Group, Incorporated."

18 This is the 30(b)(6) deposition of Paul
19 Turner. The court reporter today is Amanda Kallas.

20 Will each of the attorneys present please
21 state your appearance for the record.

22 MR. ROGGE: My name is Mark Rogge from the
23 firm of Dickinson Wright representing the plaintiff,
24 Cellulose Material, and I am joined on video by
25 Chris Mitchell.

1 MR. MITCHELL: This is Chris Mitchell from
2 Dickinson Wright.

3 MR. SMITH: And Ryan Smith from Wilson
4 Sonsini, on behalf of the defendant and the witness.

5 THE VIDEOGRAPHER: You may swear the witness.

6 ---oOo---

7 PAUL TURNER,
8 having been duly administered an oath by the
9 court reporter, was examined and testified as
10 follows:

11 THE WITNESS: Yes I do.

12 THE STENOGRAPHER: Thank you.

13 Go ahead, Counsel.

14 ---oOo---

15 EXAMINATION

16 BY MR. ROGGE:

17 Q Can you state your name for the --

18 A Paul --

19 Q -- record?

20 A -- Turner.

21 Q And what's your address?

22 A My home address?

23 Q Or the business address.

24 A Oh. 1600 Date Street, Montebello,
25 California.

1 Q And that's the address of the business?

2 A Right.

3 Q And what is that business is called?

4 A Turner Fiberfill, Inc.

5 Q Have you ever been deposed before?

6 A No.

7 Q "No."

8 So how this will work is, I'm going to ask
9 you some questions about the company, about the
10 product you make, and about some documents.

11 And you were sworn by the court reporter.

12 Do you understand that you're here to tell
13 the truth and you have to tell the truth under oath?

14 A Correct. Right.

15 Q We are obviously recording by video, but I
16 ask that you give verbal answers as opposed to
17 nodding so that we do have it on the transcript.

18 Do you understand that?

19 A Yeah, yeah. Okay.

20 Q If a question I ask is unclear, let me know,
21 and I'll reframe it and re-ask it.

22 A Okay.

23 Q I ask that you wait for me to finish the
24 questions before answering so that we don't talk
25 over each other, and also to give your counsel a

1 A And -- and laminated to a polyester fiber
2 material.

3 Q Yeah, so it's a polyester film on either side
4 of a polyester fiber material?

5 A Correct.

6 Q There were no -- I'll refer to this as "the
7 Renewliner" or "the product."

8 A Okay.

9 Q And will you understand that I'm --

10 A Yes.

11 Q -- indicating the -- all right.

12 So there are no specifications in the
13 agreement.

14 Did TSS provide any specifications to you?

15 MR. SMITH: Objection. Vague.

16 Go ahead and answer it.

17 THE WITNESS: I'm sorry?

18 MR. SMITH: I objected just to -- the
19 question's vague, but you can still go ahead and
20 answer the question.

21 THE WITNESS: Right.

22 BY MR. ROGGE:

23 Q If you understand the question. If you don't
24 understand the question, I can re-ask it.

25 A I'm not quite understanding what you mean.

1 Q How -- when TSS approached you to make this
2 product --

3 A Right.

4 Q -- how did you know what to make?

5 A That's a good question. It goes back a long
6 time. I don't remember. I really don't remember.
7 I mean, how do I know -- obviously, he must have --
8 he or somebody may have told us that -- to make a
9 polyester fiberfill at that spec, but I don't recall
10 who did it -- I really don't -- whether it was Sal
11 or Ben, or somebody, whatever.

12 Q And just for the record, who's Sal? Who is
13 Sal? What's Sal's full name?

14 A I don't know. Salvatore, that's all I -- I
15 don't know what his last name is.

16 Q And do you know Chris's last name?

17 A Who?

18 Q Chris. You -- I thought you said "Chris."
19 Oh, you said "Ben"?

20 A Ben.

21 Q You said "Ben"?

22 A No, I don't know Ben's last name.

23 Q Okay.

24 A He doesn't work there anymore anyway.

25 Q So you were in contact with Ben and Sal?

1 A Yes.

2 Q Anybody else at TSS that you were in contact
3 with?

4 A Well, nobody that's there anymore. I can't
5 remember. There was another -- another salesperson
6 there.

7 Q And you don't remember how you got -- or you
8 weren't involved with how you got the specifications
9 or what you were supposed to make?

10 A Obviously, somebody must have told us what
11 the spec was, and so we just made it.

12 Q But sitting here today, you don't know -- you
13 don't recall who gave you the specs?

14 A No, I really don't.

15 Q Yeah. And you -- what -- do you have any
16 recollection of it being in writing or by email?

17 A No, no. It was never in writing, that I
18 recall.

19 Q You don't remember them giving you a sample?

20 A No.

21 Q And you don't recall TSS giving you any
22 documents?

23 A Documents? No.

24 Q "No."

25 And have you ever heard of a product called